

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO, *ex rel.*  
State Engineer

Plaintiff,

vs.

RAMON ARAGON, *et al.*,

Defendants.

69cv07941 BB-ACE

RIO CHAMA STREAM SYSTEM  
Section 7: Rito de Tierra Amarilla,  
Rio Brazos, Rutheron & Plaza Blanca,  
Cañones Creek, Village of Chama

**MOTION TO JOIN ADDITIONAL PARTIES DEFENDANT**

COMES NOW the Plaintiff State of New Mexico, *ex rel.* State Engineer (“State”) and respectfully requests the Court to join as additional parties the persons or entities named below and order them to answer the State’s Complaint in this action as required in any civil action in the United States District Court or suffer default judgment against them. In support of this motion, the State asserts:

1. The persons or entities listed below are diverting and using or may claim the right to divert and use surface or underground waters within the Rio Chama Stream System.

Frank D. Luna IV	CHTA-00-0011	24796 Surstar Lane, Dana Point CA 92629
John P. Zamora	CHRB-003-0017B	P.O. Box 252, Los Ojos NM 87551
Maria de la Luz Zamora	CHRB-003-0017B	P.O. Box 252, Los Ojos NM 87551
Ashley D. Cordova	CHRB-004-0018C	c/o Orlando Cordova, P.O. Box 365, Tierra Amarilla NM 87575
Hazel Ann Cordova	CHRB-004-0018C	c/o Orlando Cordova, P.O. Box 365,

Tierra Amarilla NM 87575

Harry Sanchez	CHRB-009-0026	P.O. Box 114, Los Ojos NM 87551
Patrick L. Hogan	CHCC-001-0006B	HC 75 Box 66, Chama NM 87520
Angela Hughes	CHCV-002-0005 CHCV-002-0006B	P.O. Box 214, Chama NM 87520
Susan Hammer	CHCV-002-0008	P.O. Box 1171, Chama NM 87520
Northern Rio Arriba Electric CO-OP	CHCV-003-0038	c/o Benjamin Leyba P.O. Box 217, Chama NM 87520

These waters belong to the public and are subject to appropriation in accordance with laws of the State of New Mexico. This Court has exclusive jurisdiction to adjudicate all claims to the right to divert, store, or use public waters of the Rio Chama Stream System.

2. The persons or entities listed above are in Section 7 of the Rio Chama Stream System, and may be diverting and using water associated with the subfile numbers listed, or may otherwise be using or diverting surface or underground waters within Section 7 of the Rio Chama Stream System.

DATED: November 2, 2004

Respectfully submitted,

/s/ Ed Newville  
EDWARD G. NEWVILLE  
Special Assistant Attorney General  
Office of State Engineer  
P.O. Box 25102  
Santa Fe, NM 87504-5102  
(505) 827-6150

#### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the above Motion to Join Additional Parties Defendant were mailed to following persons on November 5, 2004.

/s/ Ed Newville  
Edward G. Newville

**RIO CHAMA SECTION 7 SERVICE LIST**

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